



March 28, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Promoting the Availability of Diverse and Independent Sources of Video (DN 16-41)

Dear Ms. Dortch:

I am writing on behalf of Public Media Network (PMN), a Public-Education-Government (PEG) Community Media organization that provides a myriad of services to the residents, organizations and institutions of the greater Kalamazoo (MI) area. We have provided these services with great success since 1983 and have established ourselves as a valuable non-commercial media creation and distribution resource in the six communities we serve.

We appreciate the opportunity to provide information for the FCC's inquiry (DN 16-31). The FCC asked the following questions regarding Public, Educational, and Government Access channels in the inquiry:

"We seek comment on the MVPD's practices with respect to making PEG programming information available to subscribers. To the extent that MVPD's do not make this information available, is this for technical reasons, and if so, can the technical barriers be surmounted? Is the Congressionally-imposed prohibition against editorial control of PEG channels relevant to this issue? What is the source of the Commission's authority in this area, if any?"

PMN channels have been available on the incumbent cable television system (currently Charter Communications) since 1983. Our process to interconnect our five (5) PEG channels to a "new entrant" MVPD (AT&T U-verse) began in June, 2011 after an extensive delay due to serious concerns about the technical specifications and signal quality limitations imposed by AT&T (addressed in more detail later in this letter). In order to meet AT&T's technical criteria, we purchased a new signal encoding device (Viewcast Niagra) that was on the "recommended" hardware list provided by AT&T. In addition, we leased additional internet bandwidth (five "bonded" T-1 telephone lines) and subscribed to AT&T U-verse in order to monitor our channels on their system as subscribers would see them. In September, 2011, our five channels became "active" on the local AT&T U-verse system in addition to being available on the incumbent provider.

Charter Communications has been cooperative throughout their ownership of the original cable system in providing information to subscribers about PEG channels, including support through several channel realignments and access to the electronic programming guide. The situation with the new entrant MVPD AT&T U-verse is more problematic: from the outset, information provided to subscribers about PEG programming (remember, PMN was and is a paying subscriber) was minimal at best.

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However, the lack of information about PEG channels pales in comparison to the actual experience of trying to access the PEG content. On AT&T's U-verse system, PEG channels are NOT "channels" at all...they are low quality web video streams accessed from a "web application" embedded within the U-verse product using series of drop down menus that typically takes about thirty (30) seconds from first click to partial screen display and finally full screen display (based on actual use of the PMN subscription service).

In no sense is PEG content delivered or displayed in a manner "equivalent" to other cable programming services (ESPN, MTV, C-SPAN etc.) or other local content (local broadcast television stations) on the AT&T U-verse system. The PEG "streams" are of lower image quality (a condition directly related to the very specific encoding criteria required by AT&T), cannot be recorded using a Digital Video Recorder (DVR), cannot be directly accessed to or from any "regular" cable programming source using the provided remote control device, nor can they be "saved" as a favorite channel selection.

Feedback in our market about the difficulty finding and accessing the local PEG channels on the U-verse system is consistent – the process of going to "Channel 99" and using a series of four (4) drop down menu's to get the desired PEG channel is cumbersome at best and discriminatory at worst. AT&T has tried to claim this is an "innovative" and "efficient" methodology for delivering PEG content. Our response is: *if the placement PEG content on Channel 99 with drop down menu's is so great, why not apply this delivery scheme over the entire platform, with say, all sports content on Channel 88, all news content on Channel 77, and all local affiliate content on Channel 66? The answer is simple and obvious: the methodology is flawed and would not be tolerated by commercial programmers.*

In addition to the issues I've described above, because PEG channels are essentially a web stream sourced from outside the rest of the U-verse content envelope, the presentation of PEG content is often adversely impacted by the somewhat limited broadband capabilities provided to a U-verse customer. We very often get reports from U-verse subscribers that they cannot watch PEG programming if anyone else in the household is online – the bandwidth limitations of U-verse "freeze" the picture while all other programming on U-verse remains unaffected. This has never been an issue described to us by Charter Communications subscribers watching the same programming.

Before elaborating on the technical difficulties PEG providers have with the AT&T U-verse system, let me provide some basic detail of the technical specifications AT&T requires PEG content providers to meet:

Video Encoding Format:	Windows Media 9 VC-1 Main Profile
Input Format:	NTSC
Scanning Type:	Non-interlaced
Video Streaming Bandwidth:	1 Mbps
Output Resolution:	320 X 240
Audio Sample Rate:	48 kHz
Audio Encoding Format:	WMA (Windows Media Audio)

Source: AT&T PEG Equipment & Transport Information V.2

While Windows Media 9 VC-1 encoding might have been acceptable in 2008, there have been numerable advances in video codec development that would allow for encoding at a much higher quality and still fit within the narrow bandwidth constraint required by AT&T. In fact, PMN has had to "dumb down" our channel streams from standard settings in our encoding hardware to meet the AT&T criteria. We find this unacceptable and inexcusable, when we currently provide broadcast quality standard definition signals to the incumbent MVPD in our market, Charter Communications.

In addition to the encoding format and delivery limitations mentioned above, our experience with AT&T U-verse included almost two years of having our content displayed in an incorrect aspect ratio (3:3) until we were able to resolve the issue with the manufacturer of the encoder (Viewcast), with little to no support from AT&T U-verse on this issue. With this correction, PMN content is now displayed in the correct 4:3 aspect ratio for standard definition NTSC video.

PMN is now at a stage in our technical capability that all studio and field video recording is done in High Definition (HD), and all post-production systems are capable of HD editing and output. All of the content produced and archived by PMN is in HD, and most of the content created by community producers is HD. Our Master Control System (using Leightronix Ultra Nexus Standard Definition Media Servers) outputs NTSC standard definition signals that are sent by optical transmitter to Charter Communications and in the web stream format described herein to AT&T U-verse.

We are prepared to upgrade our Master Control System to HD output when our PEG channels can be available on our local MVPD systems in this format. ***We believe it is in the public interest to have local PEG content available to MVPD subscribers in HD, which is fast becoming the quality they are accustomed to receiving commercial cable services and local broadcast services, thus eliminating the disparity in treatment of local non-commercial content on an MVPD system.***

We greatly appreciate this opportunity to provide information concerning our experience into the record.

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry S. Haasch", with a long horizontal flourish extending to the right.

Harry S. Haasch
Executive Director, Public Media Network